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The Honorable Brian A. Tsuchida

AUG 28 2024

AT SEATTLE
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WESTERN DISTRICT OF WASHINGTON
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

RICHARD STANLEY MANESS, JR.,
Defendant.

CASE NO. MJ24-531

COMPLAINT for VIOLATION
Title 18 U.S.C § 2251(a), (e).

Before the Honorable Brian A. Tsuchida, United States Magistrate Judge, United States Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE

Production of Child Pornography)

Between in or about November 2023 and in or about April 2024, in King County, within the Western District of Washington, and elsewhere, RICHARD STANLEY MANESS, JR., did employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, and attempt to do so, knowing and having reason to know that such visual depiction will be

1 transported and transmitted using any means and facility of interstate and foreign
2 commerce and in and affecting interstate and foreign commerce and mailed, such visual
3 depiction was produced and transmitted using materials that have been mailed, shipped,
4 and transported in and affecting interstate and foreign commerce by any means, including
5 by computer, and such visual depiction has actually been transported and transmitted
6 using any means and facility of interstate and foreign commerce and in and affecting
7 interstate and foreign commerce and mailed.
8

9 All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

10 And the complainant states that this Complaint is based on the following
11 information:
12

13 I, Special Agent Garrett Saxton, being duly sworn under oath, depose and say:

14 **INTRODUCTION**

15 1. I am a Special Agent ("SA") with the Department of Homeland Security
16 ("DHS"), Homeland Security Investigations ("HSI"). I have held such a position since
17 October 2023. HSI is responsible for enforcing the customs and immigration laws and
18 federal criminal statutes of the United States. I am currently assigned to the Office of the
19 Special Agent in Charge ("SAC"), Seattle, Washington, and am a member of the Child
20 Exploitation Crimes Investigations Group. As part of my current duties, I investigate
21 criminal violations relating to child exploitation and child sexual abuse materials,
22 including violations pertaining to the illegal production, distribution, receipt, and
23 possession of child sexual abuse materials and materials involving the sexual exploitation
24 of minors in violation of 18 U.S.C §§ 2251, 2252, and 2252A. I have also had the
25 opportunity to observe and review examples of child sexual abuse materials (as defined
26 in 18 U.S.C § 2256(8) and RCW 9.68A.011).

27 2. As part of my current duties as an HSI Criminal Investigator, I investigate
28 criminal violations relating to child exploitation and child pornography including

violations of Title 18, United States Code, Sections 2251(a), 2252(a)(2), 2252(a)(4)(B),

1 and 2243(a)(1). I have received training about child pornography and child exploitation,
2 and have observed and reviewed numerous examples of child pornography in various
3 forms of media, including media stored on digital media storage devices such as
4 computers, tablets, cellphones, etc. I am a graduate of the Criminal Investigator Training
5 Program ("CITP"), and the HSI Special Agent Training ("HSISAT") at the Federal Law
6 Enforcement Training Center in Glynco, Georgia.

7 3. The facts set forth in this Complaint are based on my own personal
8 knowledge; knowledge obtained from other individuals during my participation in this
9 investigation, including other law enforcement officers; review of documents and records
10 related to this investigation; communications with others who have personal knowledge
11 of the events and circumstances described herein; and information gained through my
12 training and experience. I have not set forth all facts known to me as a result of this
13 investigation but only those facts I believe necessary to establish probable cause to
14 conclude that RICHARD STANLEY MANESS, Jr., committed the offense(s) charged in
15 this Complaint.

16 SUMMARY OF THE INVESTIGATION

17 4. In June 2024, Vietnamese law enforcement sought assistance from U.S. law
18 enforcement related to an ongoing child exploitation investigation. According to records
19 obtained from Vietnam, in April 2024, Richard Stanley MANESS Jr. (DOB
20 XX/XX/1987), conspired with a Vietnamese national (S1) to arrange for the sexual
21 assault of children and the creation of child sexual abuse imagery.

22 5. According to reports from foreign law enforcement, S1 met MANESS on a
23 Vietnamese dating app. And in November 2023, MANESS went to Vietnam to meet S1
24 in person. After returning to the United States in December 2023, MANESS continued
25 chatting with S1 via the Zalo social media application.¹

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27
28 ¹ Zalo is a social media application, available for both smartphones and computers, that offers a variety of features to include instant messaging and group chat, multimedia sharing, and hotel booking.

1 6. Vietnamese law enforcement's investigation revealed that S1 abducted two
 2 young girls (MV1 and MV2) and kept them at an Airbnb rented by MANESS from April
 3 3 through April 8, 2024. Messages exchanged between S1 and MANESS on Zalo during
 4 this period show S1 sexually abusing these children at MANESS's direction and sending
 5 him child sexual abuse imagery, among other things.

6 7. Vietnamese authorities provided screenshots of Zalo chats between S1 and
 7 MANESS, which I have reviewed and summarize below:

- 8 • Around April 3, 2024, MANESS sent S1 the following: "You rush me,
 9 you're supposed to find the girl and we agree then get condo...lol but you
 10 got her already... Let me find okay... I will book for you... While I'm
 11 looking... continue to take pictures with her." Soon after, he provided S1
 12 instructions on how to get into an apartment that records show he booked
 13 through Airbnb on April 3, 2024: "The room is 10.05... Enter the
 14 combination... Then when you get to the door, to go inside the combo is
 15 938299533#."
- 16 • S1 then began sending pictures and videos of MV1 and MV2 in the nude.
 17 It appears from the chats that MANESS was primarily interested in
 18 imagery of MV1, as there is little discussion of MV2 in the chats.
- 19 • On April 5, MANESS sent S1 pictures of women in sexual poses in which
 20 they were bent over and exposing their anuses/genitals and said, "Make her
 21 do this, that's what I described. Then, she can earn games... Bend over and
 22 open... I love that... Because she'll need to learn to bend over and open up
 23 for daddy, because she'll will do that for me whenever I want to fuck her.
 24 Same for you, bend over baby."
- 25 • Thereafter, S1 sent MANNESS six pictures of MV1. The photos show
 26 MV1 bending over while nude, her hands resting on the floor, with the
 27 pictures being taken from behind and the focal point on MV1's
 28 buttocks/genitals. In one of the photos, which is focused even more

1 closely on MV1's buttocks/genitals, a hand is spreading her buttocks and
2 clearly exposing her anus to the camera. MV1's pose appears to be
3 consistent with the imagery MANESS sent of other women described
4 above.

- 5 • MANESS also sent S1 the following message: "The days are slow because
6 I'm waiting... It is worse waiting now because I have ticket and I know
7 when I'll see [you]... Only few more days... then we can watch tv together
8 and fuck and relax at home and fuck [MV1] a lot and we will be happy
9 together even if we don't go out."
- 10 • In a separate chat, MANESS was even more explicit about his intentions.
11 S1 messaged MANESS asking, "will you make [MV1] cry?" to which
12 MANESS replied, "It's not my plan... But maybe she will cry when she
13 gets fucked? I don't know... I think she may not cry if you practice making
14 her pussy and ass bigger with your fingers or toys before I arrive... Are
15 you worried I will make her cry?" S1 responded, "no, I want to see you
16 make her cry hahaha... She won't dare cry, she's very afraid of me."
17 MANESS then responded, "If you want her to cry, hold her still while I
18 fuck her ass... I can if you want... But it wasn't my plan, my plan is to
19 fuck her, idk if she will cry... But she will learn to take a big dick and
20 submit to me... Do you want me to fuck [MV1] hard?" S1 responded,
21 "yes."
- 22 • On April 5, 2024, S1 sent MANESS a photo of MV1 holding a cylindrical
23 object in her hand and putting the object in her mouth. After sending this
24 photo, S1 stated, "Maybe she hasn't mastered this yet... That was my
25 bottle of lubricant when I used it on the girl whose ass I fucked." On April
26 6, 2024, S1 sent more depictions of MV1. In these depictions, MV1 is
27 lying down in the nude with a bottle of lubricant in her mouth. In some of
28 the images, an apparent adult hand is holding MV1's thigh, as to expose

her genitalia. MANESS responded, "I love it... She's learning well... I'm excited for her to suck my dick... I bought some lubricant that helps to reduce pain, so I can also use that on her later to fuck... Did you try yet to stick your fingers insider her pussy? I think maybe she's not a virgin anymore once you put your fingers inside."

- On April 7, 2024, S1 sent MANESS more visual depictions of MV1. MV1's face is visible in two of them, but the remainder are focused on her genitals. An apparent adult hand is touching MV1's genitals in several of the visual depictions. After sending this imagery, S1 sent the following: "It's hard to get it in, so I can't get my finger in yet... she cried... idk , I don't know what to do." MANESS responded, "Thank you for all the great videos... Her pussy is very small, it takes a lot of training to make it big enough to fuck. Remember to use lube and make sure your finger nails are removed so your finger is soft. Or, you can find other soft things to use."

8. Based on MV1's youthful appearance, lack of pubic/body hair, lack of muscular/pubic development, and small stature, it is apparent she is prepubescent. I estimate MV1 is between 4 and 8 years old.

9. On April 8, 2024, Vietnamese law enforcement identified the apartment where S1 was keeping these children at 92 Nguyen Huu Canh, Ward 22, Binh Thanh District, Apartment 10.05, Ho Chi Minh City, Vietnam. They interviewed S1, and she confessed to the abduction and abuse of these two minors.

10. In the screenshots provided by Vietnamese law enforcement, the username visible for MANESS's Zalo account is visible and displayed as "RichardManess".

11. Vietnamese law enforcement also provided a screenshot of the account used to book the Airbnb. The name for the account is displayed as "Richard" and the profile photo is a Caucasian male wearing a hat and sunglasses. I have reviewed MANESS's driver's license photo provided by the Washington Department of Licensing

1 and noted that MANESS is also a Caucasian male. The visible facial features of the two
2 men depicted in each photo are consistent, though I cannot say definitively they depict
3 the same person. The Airbnb screenshot also shows a small list of descriptors for the
4 profile user, including the statement: “Born in the 80s”

5 12. I located travel records showing that MANESS travelled from Seattle to Ho
6 Chi Minh City, Vietnam, on November 23, 2023. He returned to Seattle on December 3.

7 13. I located a phone number associated with MANESS and currently assigned
8 to T-Mobile. Subscriber records provided by T-Mobile show that this phone number,
9 (360) 421-3260, belongs to an account in MANESS’s name.

10 14. Consistent with the information provided by Vietnamese law enforcement,
11 I located an Airbnb account in MANESS’s name that is also linked to the phone number
12 above and the email “tonalsoul@gmail.com”. Records provided by Airbnb show that this
13 account booked a rental at 92 Nguyen Huu Canh, Binh Thanh, Ho chi Minh², Vietnam,
14 for seventeen nights starting April 3, 2024, which was paid for using Apple Pay.

15 15. Among the information provided by Vietnamese law enforcement was a
16 screenshot of an email from Airbnb to the host who owns the condo MANESS rented.
17 The email indicates “Richard” cancelled the remaining days of the booking. The email
18 contains a confirmation for the booking, which is the same confirmation number for the
19 reservation contained in the records provided by Airbnb described in the preceding
20 paragraph. Airbnb records reflect that MANESS was initially charged \$860.23 for this
21 reservation and was refunded \$439.90.

22 16. These records also included screenshots of apparent chats between the
23 Airbnb host and the renter. The renter is identified as “Richard.” In the chats, Richard
24 tells the host that no housekeeping will be necessary during the rental period and that his
25
26
27

28 ² Although this address does not have the Ward listed, like the report from Vietnamese law enforcement, it is
suspected that the two addresses are connected to the same residence. “Ward 22” is the township or commune where
the address is located. Ward 22 resides within the Binh Thanh district of Ho Chi Minh City, Vietnam.

1 fiancé will take care of cleaning. Richard also told the host that he was not currently in
2 Vietnam but was planning to travel there.

3 17. Of note, the chats between MANESS and S1 included messages where
4 MANESS told S1 to ensure no one entered the condo where she and the children were
5 staying. He said she would need to stay inside the condo during daytime hours and only
6 go out at night.

7 18. My initial investigation suggested that MANESS was living in an
8 apartment in Kenmore, Washington. In late July, I learned that MANESS moved out of
9 that apartment in March 2024. I located a change of address form showing that
10 MANESS directed the U.S. Postal Service to forward his mail to an address in California,
11 which I determined to be his parents' home.

12 19. On August 6, 2024, I sent Apple a summons for information relating to
13 MANESS and any iCloud accounts associated with "tonalsoul@gmail.com". Apple
14 provided iCloud³ information for all accounts associated with MANESS. Among these
15 accounts registered to MANESS was "richard.s.maness@gmail.com",
16 "tonalsoul@gmail.com", and an account with S1's name:
17 "queen.[REDACTED]@gmail.com". Apple also provided IP connection logs listing IP
18 addresses that had been used to connect to these accounts. Law enforcement indices
19 showed that seven of the IP addresses used to connect to the "tonalsoul@gmail.com"
20 iCloud account between July 15, and August 5, 2024, belonged to Comcast.

21 20. On August 21, 2024, Comcast provided subscriber information associated
22 with these IP addresses showing that at the time they were used to connect to the above
23 iCloud account, they were assigned to BW with a service address in Seattle.

24 21. On August 21, 2024, I conducted surveillance at this apartment and saw an
25 adult male leave the apartment and get into the elevator. I recognized this male as
26 MANESS.

27
28 ³ iCloud is the service from Apple that securely stores your photos, files, notes, passwords, and other data in the cloud and keeps it up to date across all your devices automatically.

1 22. I applied for warrants to search MANESS's person and this residence,
2 which federal and local law enforcement executed on the morning of August 28, 2024. I
3 encountered MANESS in the home and asked if he would speak with me. He invoked
4 his rights, and I did not question him further.

5 23. Agents interviewed BW, who was present in the home. BW confirmed she
6 and MANESS had been dating since May and that they initially met online. She
7 explained that MANESS has been transient for the last few months, often staying at
8 hotels around King County and began staying with her in her home more consistently
9 over the last few weeks.

10 24. BW also reported that MANESS has a storage unit but was unaware of its
11 location. BW identified MANESS's car, a Hyundai SUV. The car is not registered to
12 him, but BW reported that he inherited it from a deceased relative.

13 25. During the search, agents located financial records showing significant
14 financial transactions from accounts associated with MANESS to unidentified
15 individual(s) in Vietnam.

16 26. Agents also seized several digital devices, including a smartphone, laptop
17 computer, and an external storage device. The devices were encrypted and have been
18 transported to HSI Seattle for further examination.

CONCLUSION

27. Based on the above facts, I respectfully submit that there is probable cause to believe that RICHARD STANLEY MANESS, Jr., committed the offense(s) charged in this Complaint.



Garett Saxton, Affiant
Special Agent, HSI

Subscribed and sworn to before me this 28th day of August, 2024.



BRIAN A. TSUCHIDA
United States Magistrate Judge